

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 15
)	
PERFORADORA ORO NEGRO, S. DE R.L. DE)	Case No. 18-11094 (SCC)
C.V., <i>et al.</i> ,)	
)	
Debtors.)	
_____)	
GONZALO GIL-WHITE, PERSONALLY AND)	Adv. Pro. No. 19-01294 (SCC)
IN HIS CAPACITY AS FOREIGN)	
REPRESENTATIVE OF PERFORADORA ORO)	
NEGRO, S. DE R.L. DE C.V. AND)	
INTEGRADORA DE SERVICIOS)	
PETROLEROS ORO NEGRO, S.A.P.I. DE C.V.,)	
)	
Plaintiff,)	
v.)	
)	
ALP ERCIL, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**[PROPOSED] ORDER GRANTING SINGAPORE DEFENDANTS'
MOTION TO DISMISS**

WHEREAS, Plaintiff Gonzalo Gil-White, personally and in his capacity as Foreign Representative of Perforadora Oro Negro, S. de R.L. de C.V. and Integradora de Servicios Petroleos Oro Negro, S.A.P.I. de C.V. (with his successor and assigns, the “**Plaintiff**”) commenced this adversary proceeding against, among others, Defendants Oro Negro Primus, Oro Negro Laurus, Oro Negro Fortius, Oro Negro Decus, and Oro Negro Impetus, Roger Bartlett, Roger Hancock, and Hunter Cochrane, Jr. (together, the “**Singapore Defendants**”) by filing a Complaint on June 6, 2019 (the “**Complaint**”);

WHEREAS, On August 26, 2019, the Singapore Defendants filed a motion to dismiss the Complaint and a memorandum of law in support thereof (the “**Motion to Dismiss**”);

WHEREAS, the Plaintiff filed pleadings in opposition to the Motion to Dismiss and the Singapore Defendants filed a reply in further support of the Motion to Dismiss, and

WHEREAS, the Court considered all pleadings, objections and replies filed in respect of the Motion to Dismiss, and held a hearing on the motion to dismiss on [DATE];

And upon all pleadings, arguments of counsel and the record of the hearing,

IT IS HEREBY ORDERED as follows:

1. The Motion to Dismiss is granted in all respects.
2. The Complaint as against the Singapore Defendants shall be and hereby is dismissed with prejudice.

Dated: New York, New York
[DATE]

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE